

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

24 MAG 1055

UNITED STATES OF AMERICA

v.

MARIA CLARA SERNA THERAN,

Defendant.

SEALED COMPLAINT

Violations of 18 U.S.C. §§ 1038(a)(1),
844(e)

COUNTY OF OFFENSE:
NEW YORK

SOUTHERN DISTRICT OF NEW YORK, ss.:

RAYMOND DIPILLO, being duly sworn, deposes and says that he is a Special Agent with Homeland Security Investigations, Department of Homeland Security, and a member of the Joint Terrorism Task Force (“JTTF”), and charges as follows:

COUNT ONE
(False Information and Hoaxes)

1. On or about February 1, 2024, in the Southern District of New York and elsewhere, MARIA CLARA SERNA THERAN, the defendant, knowingly engaged in conduct with intent to convey false and misleading information under circumstances where such information may reasonably have been believed and where such information indicated that an activity had taken, was taking, and would take place that would constitute a violation of Title 18, United States Code, Sections 2332a(a) (use of a weapon of mass destruction), 2332f(a) (bombing a place of public use or government facility), and 844(i) (destruction of a building by means of explosive), to wit, SERNA THERAN conveyed false bomb threats to United States Citizenship and Immigration Services.

(Title 18, United States Code, Section 1038(a)(1).)

COUNT TWO
(False Information and Hoaxes)

2. On or about February 2, 2024, in the Southern District of New York and elsewhere, MARIA CLARA SERNA THERAN, the defendant, knowingly engaged in conduct with intent to convey false and misleading information under circumstances where such information may reasonably have been believed and where such information indicated that an activity had taken, was taking, and would take place that would constitute a violation of Title 18, United States Code, Sections 2332a(a) (use of a weapon of mass destruction), 2332f(a) (bombing a place of public use or government facility), and 844(i) (destruction of a building by means of explosive), to wit, SERNA THERAN conveyed false bomb threats to United States Citizenship and Immigration Services.

(Title 18, United States Code, Section 1038(a)(1).)

COUNT THREE
(False Information and Hoaxes)

3. On or about February 13, 2024, in the Southern District of New York and elsewhere, MARIA CLARA SERNA THERAN, the defendant, knowingly engaged in conduct with intent to convey false and misleading information under circumstances where such information may reasonably have been believed and where such information indicated that an activity had taken, was taking, and would take place that would constitute a violation of Title 18, United States Code, Sections 2332a(a) (use of a weapon of mass destruction), 2332f(a) (bombing a place of public use or government facility), and 844(i) (destruction of a building by means of explosive), to wit, SERNA THERAN conveyed false bomb threats to United States Citizenship and Immigration Services.

(Title 18, United States Code, Section 1038(a)(1).)

COUNT FOUR
(Bomb Threats)

4. On or about February 1, 2024, in the Southern District of New York and elsewhere, MARIA CLARA SERNA THERAN, the defendant, willfully and knowingly did, through the use of the mail, telephone, telegraph, and other instruments of interstate and foreign commerce, and in and affecting interstate and foreign commerce, make a threat, and maliciously convey false information knowing the same to be false, concerning an attempt and alleged attempt being made, and to be made, to kill, injure and intimidate an individual and unlawfully to damage and destroy a building, vehicle, and other real and personal property by means of an explosive, to wit, SERNA THERAN conveyed false bomb threats to United States Citizenship and Immigration Services.

(Title 18, United States Code, Section 844(e).)

COUNT FIVE
(Bomb Threats)

5. On or about February 2, 2024, in the Southern District of New York and elsewhere, MARIA CLARA SERNA THERAN, the defendant, willfully and knowingly did, through the use of the mail, telephone, telegraph, and other instruments of interstate and foreign commerce, and in and affecting interstate and foreign commerce, make a threat, and maliciously convey false information knowing the same to be false, concerning an attempt and alleged attempt being made, and to be made, to kill, injure and intimidate an individual and unlawfully to damage and destroy a building, vehicle, and other real and personal property by means of an explosive, to wit, SERNA THERAN conveyed false bomb threats to United States Citizenship and Immigration Services.

(Title 18, United States Code, Section 844(e).)

COUNT SIX
(Bomb Threats)

6. On or about February 13, 2024, in the Southern District of New York and elsewhere, MARIA CLARA SERNA THERAN, the defendant, willfully and knowingly did, through the use of the mail, telephone, telegraph, and other instruments of interstate and foreign commerce, and in and affecting interstate and foreign commerce, make a threat, and maliciously convey false information knowing the same to be false, concerning an attempt and alleged attempt being made, and to be made, to kill, injure and intimidate an individual and unlawfully to damage and destroy a building, vehicle, and other real and personal property by means of an explosive, to wit, SERNA THERAN conveyed false bomb threats to United States Citizenship and Immigration Services.

(Title 18, United States Code, Section 844(e).)

The bases for my knowledge and for the foregoing charges are, in part, as follows:

7. I have been personally involved in the investigation of this matter, and I base this affidavit on that experience, as well as on my conversations with other law enforcement agents and other people, and my examination of various reports and records, including audio recordings of telephone calls. Because this affidavit is being submitted for the limited purpose of demonstrating probable cause, it does not include all the facts that I have learned during the course of my investigation. Where the contents of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part.

8. Based on my review of records from United States Citizenship and Immigration Services (“USCIS”), including audio recordings of telephone calls, I have learned, in substance and in part, the following:

a. When an individual places a call to the USCIS Contact Center, her call is first answered by an interactive voice response telephone system that provides a variety of self-service options.

b. On or about January 24, 2024, a female (“Individual-1”) placed three telephone calls to the USCIS Contact Center from a certain call number (“Call Number-1”) and asked to speak with an agent in connection with a lost Permanent Resident Card (i.e., Green Card). During at least one phone call, Individual-1 stated that she needed to “make an appointment to go to Federal Plaza.” The USCIS field offices serving New York City, Brooklyn, and Queens are all located at the Jacob K. Javits Federal Office Building, 26 Federal Plaza, New York, New York 10278 (the “Javits Building”).

c. On or about February 1, 2024, a person whom I believe to be Individual-1 called the USCIS Contact Center from Call Number-1 and reiterated her request to speak with an agent. At the beginning of the call, Individual-1 stated, “I’m gonna have to say there is a fucking bomb in the building” and later reiterated, “There is a bomb in your building.” Individual-1 was connected with a USCIS agent and identified herself as “Maria Clara Serna Theran” and provided

her A-Number,¹ date of birth, phone number, and email address. The identifying information that Individual-1 provided matches that of MARIA CLARA SERNA THERAN, the defendant, in USCIS's records. Additionally, the phone number that Individual-1 provided is the same as Call Number-1.

d. On or about February 2, 2024, SERNA THERAN called the USCIS Contact Center from Call Number-1, requested to speak with an agent to make an appointment, and stated, "There is a bomb in your building."

e. On or about February 13, 2024, SERNA THERAN placed six calls to the USCIS Contact Center from Call Number-1 in connection with an application to replace a lost Green Card. In each call, SERNA THERAN requested to speak with an agent and stated, "There is a bomb in the building" at least once. Across the six calls, SERNA THERAN made eleven bomb threats.

f. On or about February 15, 2024, SERNA THERAN went to the USCIS field office serving Queens located at the Javits Building in Manhattan, where she was fingerprinted in connection with her application to replace a lost Green Card.

g. In total, SERNA THERAN placed eight calls to the USCIS Contact Center in which she made bomb threats and made fourteen bomb threats during such calls.

9. Based on my participation in the investigation and my review of law enforcement reports, I have learned, in substance and in part, the following:

a. On or about February 20, 2024, I and other members of the JTTF interviewed SERNA THERAN at her residence in Queens.

b. We advised SERNA THERAN that she was recorded on multiple phone calls to USCIS stating that there was a bomb in the building.

c. SERNA THERAN admitted, in sum and substance, that she made these statements, that they were false, and that she made them because she thought her call would then be transferred to a USCIS agent. SERNA THERAN also stated, in sum and substance, that she did not possess any explosives or materials to manufacture an explosive device.

¹ An A-Number is a unique number assigned to a noncitizen by the Department of Homeland Security.

d. With SERNA THERAN's consent, we searched the residence for evidence of explosives and related materials, with negative results.

WHEREFORE, I respectfully request that a warrant be issued for the arrest of MARIA CLARA SERNA THERAN, the defendant, and that she be arrested, and imprisoned or bailed, as the case may be.

/s/ Raymond DiPillo, with permission by SDA
Raymond DiPillo
Special Agent
Homeland Security Investigations

Sworn to me through the transmission of
this Complaint by reliable electronic
means (telephone), this 13th day of March, 2024.

A handwritten signature in blue ink, appearing to read "Stewart D. Aaron".

THE HONORABLE STEWART D. AARON
United States Magistrate Judge
Southern District of New York